

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: **AUG 27 2008**

UNITED STATES DISTRICT COURT
For The Southern District Of New York

SPEC OPS EXPO;
SPEC-OPS EXPO; SPEC OPS;
SPECIAL OPERATIONS EXPO;
SPECIAL OPERATIONS EXPOSITION
AND TRADE SHOW, INC.;
SPECIAL OPERATIONS EXPOSITION
& CONFERENCE; THOMAS BUMBACK;
And J. K. IDEMA,

Plaintiffs,

vs.

THE LODESTAR GROUP, LLC;
DEFENSE TRADE SHOWS;
CATHERINE VILGA, JEANNE EURY;
ROBERT E. BESAL,
GRAINGER R. BARRETT;
RICK RENO; DIONNE LeBLANC-HILL;
CUMBERLAND COUNTY CIVIC
CENTER; CROWN CENTER;
CUMBERLAND COUNTY CIVIC
CENTER COMMISSION;
CUMBERLAND COUNTY CIVIC CENTER
COMMISSION, dba CROWN CENTER and
dba CROWN COLISEUM;
CROWN CENTER aka COLISEUM; and,
JOHN DOES 1-12;
In their official and unofficial capacities,
Both jointly and severely,

Defendants.

Plaintiffs'
Request for Extension of Time
To Serve Summons and
Complaint On Two Defendants
Rick Reno & Dionne LeBlanc-Hill

Case # 08 CV 3824 (PAC)

Assigned Judge:
Honorable Paul A. Crotty

Magistrate Judge:
Honorable Theodore H. Katz

MEMO ENDORSED

*This motion is rejected. It
does not conform with the Court's
Individual Practice Rules. The
Plaintiffs comply the Court will
consider such request.
Sounded
Paul Hestey
JES.*

MOTION FOR EXTENSION OF TIME TO SERVE SUMMONS AND COMPLAINT

NOW COMES, Plaintiffs, pursuant to Rule 4 Summons (m) of the Federal Rules
of Civil Procedure, and hereby requests that this Honorable Court extend the time to serve

MEMO ENDORSED

the summons and complaint on certain defendants in this case for an additional 90 days. This request is based upon the unavailability of certain defendants for service.

1. The time to serve the summons and complaint (within 120 days) will expire on midnight August 20th 2008. Plaintiffs require 60 additional days to serve Defendant Rick Reno.

2. Plaintiffs have made a diligent effort to serve all defendants and hired numerous process servers to locate and serve them.

3. Plaintiffs have served all Defendants except two, in spite of concerted efforts by Defendants to evade service. Our process servers were attempting service until just before midnight tonight.

4. **Rick Reno** cannot be located. We ascertained that he also uses the name Henry Reno, and still lists a Fayetteville address which has not been at since 2007. We have hired a variety of investigators who eventually tracked him to a new job in Roanoke Rapids North Carolina. However, he has evaded service and his home cannot be located.

5. **Dionne LeBlanc-Hill** lives somewhere in Fayetteville North Carolina, but she cannot be located after one month of searching. The Crown Center employees refuse to give out any information about her whereabouts.

WHEREFORE, plaintiffs request this Honorable Court, or the Clerk of Courts, enter an order extending the time to perfect service on the following defendants for an additional 60 days from today: **RICK RENO**, and other relief which this Honorable Court deems just and proper.

This 20th day of August 2008,

s/
John Edwards Tiffany,
Attorney (JT7322)
Law Offices of John E. Tiffany P.C.
The Robert Treat Center
50 Park Place, 10th Floor,
Newark, New Jersey 07102
Tel: (973) 242-3700
Fax: (973) 242-3799